

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOTOROLA, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
LEMKO CORPORATION, XIAOHONG)	
SHENG, SHAOWEI PAN, HANJUAN JIN,)	
XIAOHUA WU, XUEFENG BAI, NICHOLAS)	
LABUN, BOHDAN PYSKIR, HECHUN CAI,)	
JINZHONG ZHANG, ANGEL FAVILA,)	
ANKUR SAXENA, RAYMOND HOWELL,)	Case No. 08 CV 5427
FAYE VORICK, NICHOLAS DESAI, , and)	
HUAWEI TECHNOLOGIES CO., LTD., a)	
Chinese corporation,)	Judge Matthew F. Kennelly
)	
Defendants.)	Magistrate Judge Geraldine Soat Brown
)	
* * * * *)	
)	
LEMKO CORPORATION, SHAOWEI PAN,)	
XIAOHUA WU and XIAOHONG SHENG,)	
)	
Counter-Plaintiffs,)	
)	
v.)	
)	
MOTOROLA, INC.,)	
)	
Counter-Defendant.)	

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 83.17, Michael D. Karpeles, Richard D. Harris, Charles B. Leuin, Jonathan H. Claydon, Barry R. Horwitz and Paul A. Del Aguila, the lawyers from Greenberg Traurig, LLP who have filed appearances in this matter (collectively, “Greenberg”), respectfully move for an Order allowing each of them leave to withdraw as counsel of record for Defendants

Lemko Corporation (“Lemko”), Nicholas Labun, Shaowei Pan, Bohdan Pyskir, Hechun Cai, Xuefeng Bai, Jinzhong Zhang, Faye Vorick, Nick Desai, and Ankur Saxena (collectively, the “Lemko Defendants”). In support of this motion, Greenberg states as follows:

1. Greenberg, through the individual lawyers referenced above, is counsel of record for the Lemko Defendants in the above-captioned matter, including with regard to the counterclaims filed in this matter by Lemko and Shaowei Pan.

2. Lemko has not been able to fulfill the agreed-upon terms of Greenberg’s retention and, therefore, Greenberg has informed all of the Lemko Defendants in writing that Greenberg would not be able to continue to serve as the Lemko Defendants’ counsel in this matter, that Greenberg would be required to file the present Motion to Withdraw, and that the Lemko Defendants would need to obtain substitute counsel.

3. By email to each of the Lemko Defendants on June 10, 2011, Greenberg advised the Lemko Defendants that Greenberg would be filing this Motion to Withdraw on this date. Greenberg also informed Lemko on several prior occasions of the fact that, unless Lemko satisfied its obligations under the parties’ retention agreement, Greenberg would seek leave to withdraw. Greenberg further advised the Lemko Defendants that they would need to retain new counsel to represent them in this matter. Greenberg has advised Lemko of all pending dates and deadlines set by the Court.

4. Greenberg has provided the Lemko Defendants with reasonable notice of this Motion to Withdraw and the hearing date, time, and location thereof by serving the Notice of Motion and Motion to Withdraw via electronic mail and by overnight mail to Lemko. Greenberg also has given notice to the Lemko Defendants through the June 10, 2011 email, of which Lemko has acknowledged receipt.

5. Lemko has consented to Greenberg's withdrawal.

6. No party will be unfairly prejudiced by Greenberg's withdrawal as counsel of record for the Lemko Defendants.

WHEREFORE, Michael D. Karpeles, Richard D. Harris, Charles B. Leuin, Jonathan H. Claydon, Barry R. Horwitz and Paul A. Del Aguila of Greenberg Traurig, LLP respectfully request that this Court enter an Order granting their Motion to Withdraw their appearances as counsel of record for each of the Lemko Defendants and granting such other and further relief as this Court deems necessary and just.

Dated: June 13, 2011

Respectfully submitted,

MICHAEL D. KARPELES, RICHARD D.
HARRIS, CHARLES B. LEUIN,
JONATHAN H. CLAYDON, BARRY R.
HORWITZ and PAUL A. DEL AGUILA

/s/ Michael D. Karpeles
Michael D. Karpeles (ARDC # 6191828)

/s/ Richard D. Harris
Richard D. Harris (ARDC # 1137913)

/s/ Charles B. Leuin
Charles B. Leuin (ARDC # 6225447)

/s/ Jonathan H. Claydon
Jonathan H. Claydon (ARDC # 6289235)

/s/ Barry R. Horwitz
Barry R. Horwitz (ARDC # 6296764)

/s/ Paul A. Del Aguila
Paul A. Del Aguila (ARDC # 6277356)

Greenberg Traurig, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60601
Tel. (312) 456-8400

CERTIFICATE OF SERVICE

The undersigned certifies that the attached *Motion to Withdraw as Counsel* was served via the CM/ECF System, this 13th day of June, 2011, upon counsel for all parties of record and upon the Lemko Defendants as set forth in the Motion.

By: /s/ Charles B. Leuin